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Attorneys for Plaintiff
LEAH BULLEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LEAH BULLEN, individually, and on
behalf of other members of the general
public similarly situated,

Plaintiff,

vs.

CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

Defendant.

Case No. 4:09-CV-04117 SBA (EDL)

**JOINT STIPULATION AND ORDER TO
EXTEND CERTAIN DEADLINES**

1 Plaintiff Leah Bullen ("Plaintiff") and Defendant Citigroup Global Markets Inc.
 2 ("CGMI"), by and through their attorneys of record, hereby stipulate to modify certain deadlines
 3 set forth in this Court's Order for Pretrial Preparation ("Order").

4 WHEREAS, Plaintiff served a Federal Rule of Civil Procedure 30(b)(6) deposition notice
 5 on June 3, 2011 for a deposition to occur June 22, 2011;

6 WHEREAS, on June 21, 2011, CGMI filed a Motion for Protective Order in response to
 7 Plaintiff's Federal Rule 30(b)(6) deposition notice;

8 WHEREAS, per the Order for Pretrial Preparation in this action, the discovery cut-off was
 9 July 1, 2011;

10 WHEREAS, this Court held a hearing on CGMI's Motion on August 2, 2011;

11 WHEREAS, at the hearing, Plaintiff's counsel informed the Court that Plaintiff has
 12 decided that she will no longer pursue class certification and is withdrawing the class allegations
 13 in her Complaint;

14 WHEREAS, the Court granted CGMI's Motion in part, without prejudice to Plaintiff re-
 15 noticing a deposition tailored to her individual claim only, regardless of the July 1, 2011
 16 discovery cut-off;

17 WHEREAS, per the Order for Pretrial Preparation, CGMI must file any dispositive
 18 motion by August 16, 2011;

19 WHEREAS, Plaintiff and CGMI need additional time to schedule and complete the
 20 deposition tailored to Plaintiff's individual claim and likely cannot do so and receive the
 21 transcript prior to August 16, 2011;

22 For the foregoing reasons, Plaintiff and CGMI hereby stipulate and respectfully request
 23 that the following modifications be made to the Court's Order for Pretrial Preparation:

| | Previous Date | New Date |
|--|----------------------|-----------------|
| 24 Dispositive Motion Hearing Deadline | 9/20/11 | 11/22/11 |
| 25 Mandatory Settlement Conference | 9/21-10/7/11 | 11/23-12/9/11 |
| 26 Pretrial Preparation | 10/11/11 | 12/13/11 |

| | | |
|--|---------------|---------------|
| Motions in Limine/Objections to Evidence | 10/18-11/1/11 | 12/27-1/10/12 |
| Pretrial Conference | 11/8/11 | 1/17/12 |
| Trial | 11/28/11 | 2/6/12 |

Dated: August 4, 2011

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Daryl S. Landy
 Daryl S. Landy
 Shweta Gera
 Attorneys for Defendant
 CITIGROUP GLOBAL MARKETS INC.

Dated: August 4, 2011

INITIATIVE LEGAL GROUP, APC

By /s/ Gene Williams
 David M. Medby
 Gene Williams
 Sang Park
 Mark Estrella
 Attorneys for Plaintiff
 LEAH BULLEN

ORDER

IT IS SO ORDERED WITH THE FOLLOWING MODIFICATION: The dispositive motion hearing deadline is by November 15, 2011. Motions in limine/objections to evidence shall be filed by no later than December 20, 2011; oppositions to motions in limine/objections to evidence shall be filed by no later than December 27, 2011; and replies to motions in limine/objections to evidence shall be filed by no later than January 3, 2012. The parties shall follow this Court's Standing Order pertaining to page limits.

IT IS SO ORDERED.

Dated: August 16, 2011


 HON. SAUNDRA B. ARMSTRONG
 UNITED STATES DISTRICT COURT JUDGE